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Transwestern Pipeline Company

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June 11, 1987

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MAR 24 1992

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Dear Mr. Satterwhite and Mr. Cary:

Transwestern Pipeline Company (Transwestern) received a copy from Mr. Cary of his letter of May 20, 1987, to Mr. Satterwhite summarizing Mr. Cary's concerns subsequent to a site visit and report by New Mexico Inspector Paul A. Karas regarding PCB contamination at four Transwestern compressor stations in the State.

I wish to take this opportunity to address the matters highlighted in Mr. Cary's letter and in the inspection report and also to express Transwestern's willingness to meet with you to discuss the course of Transwestern's PCB remediation program. Over the last several years, since shortly after Houston Natural Gas Corporation purchased Transwestern from Texas Eastern Corporation and learned of the presence of PCB contamination in the pipeline, Transwestern has been working closely with both EPA Region IX and Region VI to implement a site investigation and remediation plan for the affected facilities in Arizona and New Mexico. To date Region VI has approved a cleanup plan for the New Mexico facilities. Transwestern has conducted a major bidding solicitation process and is now identifying prospective contractors to provide cleanup services. Transwestern is investigating the feasibility of onsite incineration, biodegradation, and offsite destruction/disposal for this remediation effort.

In the course of this technology review, and in response to inquiries from Region IX, Transwestern has

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undertaken a significant risk assessment of these facilities in light of EPA's Superfund criteria and the PCB spill cleanup policy rule that became effective May 4, 1987. In my letter to Mr. Darl Mount of Region VI dated May 28, 1987 (attached), I outlined the revised time table that Transwestern intends to meet to identify the most appropriate remediation program in light of these new policy developments. In that letter, Transwestern commits to a July 22nd deadline for submitting this program for EPA approval. Assuming quick approval by EPA, Transwestern hopes to initiate this program by September of this year. Given this timetable, I believe much of the concerns expressed in Mr. Cary's letter will be addressed in the near term by the overall remediation program. Nevertheless, in the paragraphs below, I have set out more detailed responses to these concerns and have included suggested interim measures that Transwestern is taking before the remediation program begins this September.

1. Access to Contaminated Areas by Employees and Their Families. Contaminated areas are almost exclusively within the perimeter fencing of each site and are not accessible by the general public. The contaminated areas are physically accessible to station personnel and their families living onsite. However, most of the contamination is found in restricted operational areas of the facility which family members are not permitted to enter for safety reasons. Employee housing is typically located away from these operational areas and is upwind and up gradient from contaminated areas. In addition, Transwestern has posted contaminated areas with PCB signs and has initiated an employee education program to further discourage unnecessary entrance into these areas. Zones of high contamination, such as at Corona and around the former impoundments, have been secured with fencing. These contaminated areas are entered only for maintenance and/or inspection purposes by health and safety trained personnel.

2. Onsite Exposure. The potential health threat to employees has been and is continuing to be evaluated through an employee physical examination program and an evaluation of the risk associated with existing and post remediation levels of contamination. Examinations and health risk analysis have been and are being conducted by Environmental Health Associates (EHA) of Oakland, California, leaders in the evaluation of environmental

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health problems. No existing health effects associated with PCB exposure have been identified in the employees examined to date, including those at Thoreau, Station 5.

Additional analysis by EHA suggest no health risk to station personnel and their families is associated with exposure to soils containing less than 25 mg/kg PCB. As noted above, operations, personnel do not enter the contaminated areas on a daily basis. When maintenance activities are undertaken in these areas, personnel are equipped with appropriate protective gear. As part of its ongoing safety training program, Transwestern provides PCB handling, training to its operations employees. While Transwestern believes that the current exclusion measures are adequate, the Company is, in response to the concern expressed in Mr. Cary's letter, re-evaluating, in the context of our risk assessment approach, whether to construct additional temporary onsite fences around areas having greater than 25 mg/kg PCB concentrations to further reduce the risk of unauthorized entry.

Domestic water supply comes from onsite wells at the Thoreau station. Samples of this water were tested during May, 1987 and found free of PCB's at an instrumental detection level of 1 ppb. Water at the other compressor stations in New Mexico is supplied from offsite sources not subject to PCB contamination.

3. Offsite Migration

The potential for offsite migration of contamination exists at Corona and Thoreau, with a lesser potential at Laguna. PCB's are insoluble in water and are transported as material is adsorbed onto soil particles. Contaminant migration mechanisms for these particles include erosion of contaminated soils by runoff and wind. Subsurface transport is typically limited in extent due to the filtering action of the soils themselves.

Corona. Transwestern has retained Woodward-Clyde Consultants (WCC) to conduct the site investigation program. This program was designed to determine the location and extent of contamination. Based on accepted sampling techniques, the sampling program conducted to date

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is adequate to meet this need. A more detailed sampling program is intended to be incorporated into the remediation effort, as well as a verification testing program.

Offsite contamination has been identified at this station and is believed to result from both wind and runoff erosion. Most of the offsite contamination appears to be related to wind driven surface contamination along the eastern (downwind) side of the property. Contamination above 5 mg/kg appears (on the basis of sampling) to be restricted to a zone about 250 feet wide along the fence line. Bedrock outcrops in this area, and there is very little soil/vegetation present.

The other type of offsite contamination includes sediments found in the bottom of a 1 to 2 foot wide intermittent drainage which extends offsite to the southeast. Accumulations of contaminated sediment in the drainage channel vary in volume and concentration along the channel, although the total volume of sediment is small. Our sampling extended to approximately the confluence of this drainage with the next intermittent drainage, at a distance of approximately 1500 feet from the property boundary. The area is arid and water flow in the drainage is limited to the rare rainfall events.

Several actions have been taken with regard to the offsite contamination. The offsite lands are owned by the State of New Mexico. On June 1st, Transwestern was able to execute the lease agreement with the state to allow the construction of offsite fencing on state land. We are in the process of erecting that fencing at this time.

In addition, a series of drainage and sediment control structures have been installed to reduce future erosional loss of contaminated sediment. These features include diversionary trenches to route surface runoff around the heavily contaminated areas and sedimentation traps to facilitate removal of contaminated sediment from the runoff water. These traps consist of an armored berm to impound the runoff water long enough for the larger sediment particles to settle out. Accumulated water is then allowed to exit the berm through a drainage pipe elevated above the bottom of the trap. Under normal conditions, these devices have been effective in removing sediment from the runoff. However, as a result of recent unusually heavy rainfall that

occurred just prior to the site visit, some failure of these devices had occurred. The devices have been repaired, reinforced, and are currently functional. An ongoing maintenance monitoring program is also in place.

Thoreau. Offsite shallow soil samples were collected at Thoreau during the last week in May, 1987. These samples are currently being analyzed. Based on the results of this testing, the need for exclusionary fencing, sediment control, or other action will be identified.

Existing activities at Thoreau have included construction of runoff diversionary berms above the contaminated area and an impounding berm below the area.

Laguna. Offsite samples have not been collected at Laguna because of insufficient evidence that a significant problem exists. Steps taken to reduce the potential for offsite contaminant migration in the future include discontinuing use and draining of the impoundment that formerly overflowed, removal of most of the stains associated with the impoundment overflow (contaminated dirt was placed in the drained impoundment pending disposal), and implementation of improved pig handling practices.

4. Data Gaps-Corona. The vertical extent of contamination at Corona is not defined. The decision to limit vertical investigations was based on the following:

- a) The original 1981 excavation conducted by Texas Eastern, the prior owner of Transwestern, went to bedrock (15-20 feet) at which point further digging was impractical. This excavation apparently did not remove all contamination.
- b) This remediation was satisfactory to EPA.
- c) Discussions with EPA Region VI during this effort included consideration of physical limitations to excavation (i.e. Transwestern probably would not be required to excavate bedrock at this site).
- d) Groundwater at this site is approximately 380 feet deep.

Surface contamination of Corona appears to be irregular but widespread throughout the operations areas. The definition of horizontal contamination in the operational and offsite areas has been sufficiently defined in the testing done to date. Definition of the extent of surficial contamination to the NE area of the site is not complete. The reason for this is that this location appears to have been a general area of material stockpiling and small spills. Such areas were not originally identified as potential sources of contamination and consequently were not included in the sampling plan. Most of the contamination appears to be associated with localized stains or piles of contaminated soil, and should not present a major identification problem during cleanup. Soil contamination at Corona and any of the other sites is typically heterogeneous in nature and consequently difficult to define without massive sampling. For the purposes of approximating the magnitude of the problem for identification of remedial requirements, a highly detailed extent survey was not considered to be necessary or desirable. The studies conducted to date have provided sufficient information for area exclusion purposes and remedial action design. Additional sampling will be conducted in the field during actual cleanup, at which time more precise extent definition will be achieved. Verification sampling will provide additional assurance that the remediation effort has been effective.

Laguna. The single boring which did not penetrate to depths where concentrations were 25 mg/kg (i.e. auger refusal at the bedrock surface) was terminated. Like the Corona situation described above, the investigation was limited by the bedrock.

Thoreau. Additional studies of the vertical extent of contamination have been conducted and the distribution of contaminants is well defined. A hard copy of these results will be made available to the EPA when received.

5. Field Analysis. The terms of the consent agreement for Transwestern facilities in EPA Region 9 specified the application of the McGraw-Edison field PCB test procedure. Use of this procedure was initially attempted at Transwestern sites in New Mexico to provide consistency of methodology in both regions. However, laboratory confirmation testing indicated that this method was not 100 percent

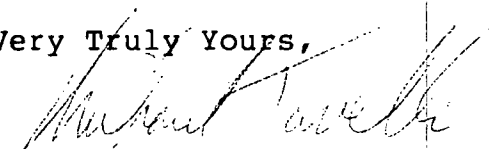
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reliable. Consequently, a field gas chromatographic technique using Transwestern's mobile laboratory was developed to meet this need and substituted for the EPA mandated McGraw-Edison procedure with excellent laboratory correlation.

While the McGraw-Edison results were suspect, they still provided a general sense of the overall areas of contamination. A second set of samples was collected at each site using the field g.c. procedure to verify the previous results. As a result, fewer second round samples were required to delineate the general areas of contamination. This was particularly true during the second round of sampling at Mountainair, where contamination was closely related to visually detectable evidence of staining.

From this letter, I hope that you can understand that Transwestern has committed to a major site investigation program that has been ongoing for some time, that the results of this investigation are now being formulated into a remediation program that encompasses the latest EPA policies regarding PCBs and risk assessments, and that this program will be submitted to both EPA regions on July 22nd. In light of this imminent remediation program, Transwestern believes it has taken sufficient precautions to protect the health and safety of its employees and the public and is acting responsibly to protect the environment. To respond to the concerns raised by Mr. Cary, I have set out in this letter additional interim measures that Transwestern is pursuing. To reinforce this effort, I am requesting that you consider a meeting with us to allow us an opportunity to explain in more detail the subjects covered in this letter. Please contact me directly at (713) 853-6851 to arrange a convenient time for our visit to Dallas.

Very Truly Yours,


Richard Tavelli
Director of Administration
and Environmental Affairs

cc: Mr. Darl Mount

Attachments

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